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5 Attorney for Material Witness:

MIRTA LUNA PORTILLO
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JAIME ANTONIO PRECIADO GARCIA

8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

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12 UNITED STATES OF AMERICA,) Case No.: 07 MJ 2966
13 Plaintiff,)
14 vs.) NOTICE OF MOTION AND MOTION FOR
15 SERGIO PRECIADO DIAZ; CONCEPCION) VIDEOTAPE DEPOSITION OF MATERIAL
16 GARCIA OROZCO,) WITNESSES MIRTA LUNA PORTILLO,
17 Defendants.)) HECTOR GUZMAN GARCIA, JAIME
18) ANTONIO PRECIADO GARCIA AND
19) REQUEST FOR STATEMENT OF
20) REASONS IN SUPPORT OF CUSTODY
21)
22) DATE: 1/22/08
23) TIME: 9:30 a.m.
24) DEPT: Magistrate Papas

25 PLEASE TAKE NOTICE that on January 22, 2008 at 9:30 a.m. or as soon thereafter
as counsel may be heard, material witness MIRTA LUNA PORTILLO, HECTOR GUZMAN
GARCIA and JAIME ANTONIO PRECIADO GARCIA (hereafter "Material Witnesses") by
and through his counsel, Wayne C. Mayer will bring a motion for a court order to take the
Material Witnesses' videotaped deposition.

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MOTION

Material Witnesses, pursuant to Federal Rules of Criminal Procedure, Rule 15, and Title 18 U.S.C. sec. 3144, hereby moves this court for an order to take their deposition by videotape and release them at the conclusion of the deposition. If the Court denies this motion, then Material Witnesses further requests the United States Attorney's office provide the witnesses with a Statement of Reasons in Support of Custody in accordance with Federal Rules of Criminal Procedure, Rule 46(g).

This Motion is based upon this Notice, the Memorandum of Points and Authorities in Support thereof, the Declaration of Wayne C. Mayer, the files and records in the above entitled cause, and any and all other information brought to the Court's attention prior to or during the hearing on this motion.

Dated: January 3, 2008

Respectfully submitted,

Wayne C. Mayer
Attorney for Material Witnesses
MIRTA LUNA PORTILLO,
HECTOR GUZMAN GARCIA
JAIME ANTONIO PRECIADO GARCIA